

EXHIBIT 25

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17 November 1998

Usama Bin Ladin's Finances: Some Estimates of Wealth, Income, and Expenditures [REDACTED]

[REDACTED] press accounts in recent years place Bin Ladin's wealth at about \$300 million:

- [REDACTED], this figure probably originated from rumors in the Saudi business community that the original source of Bin Ladin's wealth was a \$300 million settlement he obtained when his family bought out his share of the multi-billion dollar Bin Ladin conglomerate in Saudi Arabia.
- [REDACTED] \$300 million was a reasonable estimate of Bin Ladin's fortune as of a few years ago. This sum reportedly formed the principal stock of assets of the Al-Qa'ida organization. [REDACTED]

Since Bin Ladin left Sudan in May 1996, his assets may have been drawn down by several tens of millions of dollars.

- [REDACTED] hasty liquidations of Bin Ladin's firms and properties in Sudan yielded less than market value and that the relocation to Afghanistan initially cost Bin Ladin Afghanistan \$50-100 million. In addition, funding from Gulf patrons may have dropped off as a result of publicity about his terrorist activities.

[REDACTED] indications into the level of his assets are conflicting, however. Some reports suggest it may not have fallen at all while others suggest his network may be experiencing financial problems.

This paper was prepared at the request of Richard [REDACTED] and Multilateral Affairs, NSC. It was prepared by [REDACTED]

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OTI and [REDACTED]

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Bin Ladin's wealth includes cash, bank accounts, businesses and real estate:

- *Bin Ladin and Al-Qa'ida members control numerous bank accounts worldwide. [REDACTED] the choice of financial institutions has been based on personal contact within the bank, security concerns, and the bank's adherence to Islamic law. [REDACTED]*

[REDACTED] *Usama Bin Ladin receives funding, donations, and revenues from various sources, although we are not able to estimate with confidence the dollar value of these flows.*

- *If Bin Ladin actually controls a liquid financial empire worth \$300 million—and it is largely invested in financial institutions—the most important and reliable source of income probably is the return on investment. [REDACTED]*

The major sources of outside financial support probably are wealthy family members, several of whom maintain contact with Usama or have similar militant views; wealthy Gulf sponsors; and Islamic NGOs. Bin Ladin also appears to be developing ties to and profiting from the drug trade. Lesser sources of revenue for Al-Qa'ida appear to be from Bin Ladin-owned businesses and state sponsors.
(S NF)

[REDACTED] *Bin Ladin has incurred considerable costs in moving to Afghanistan and paid out large sums to the Taliban. While the reporting implies that considerable financial outlays had to be made, the fact that Bin Ladin was able to establish a foothold in his new environment over a relatively short period of time suggests that he had a ready availability of funds:*

- [REDACTED] *he currently maintains around 15 training camps, each of which probably accommodate 50 mujahaddin, at most, although there are no good estimates of the number of men training at each camp. Nevertheless, Bin Ladin provides food and shelter for the trainees and their families.*
- [REDACTED] *Bin Ladin provided the Taliban with approximately \$28 million in 1998 for military purposes.*

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Bin Ladin also continues to finance various Islamic extremist organizations and radical NGOs. 



3

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[REDACTED]**Bin Ladin's Initial Portfolio**

[REDACTED] press accounts in recent years place Usama Bin Ladin's wealth in the neighborhood of \$300 million:

- According to the US Embassy in Riyadh, the figure probably originated from rumors among the Saudi business and banking communities that the original source of Bin Ladin's wealth was \$300 million he obtained when his family bought out Usama's share of the multi-billion dollar Bin Ladin conglomerate.

- [REDACTED] \$300 million was a reasonable estimate of his fortune as of a few years ago; reportedly, it was the sum that constituted the initial financial capital of the Al-Qa'ida organization.

[REDACTED] Bin Ladin's assets

are held in the names of trusted Al-Qa'ida members

[REDACTED] Gaining insight into Bin Ladin's financial activities has been made more difficult since May 1996 when he departed Sudan, a place where his associates carried out financial decisions at offices of identified commercial ventures, often via established financial institutions. Bin Ladin's bases in Afghanistan are much more rudimentary and his involvement with local commercial ventures is more ad hoc. In addition, underground bankers and cash couriers—who leave virtually no paper trail—appear to have taken on an increasing role from conventional bankers as conduits for Bin Ladin money movements. Bin Ladin's financial activities probably have been driven further underground following the reported 1997 arrest of Madani al-Tayyib—who has been identified as the chief financial officer of the Al-Qa'ida organization. In recent years, there also has been greater scrutiny of Bin Ladin's financial network by foreign governments, which he undoubtedly perceives and has taken action to counter. [REDACTED]

Bin Ladin's Current Net Worth

[REDACTED] Bin Ladin and his organization may be experiencing cash shortages. Whether Bin Ladin's [REDACTED]

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estimated \$300 million portfolio of assets has increased, declined, or held steady since he arrived in Afghanistan depends on changes in streams of revenues accruing to Bin Ladin and his expenditures:

- [REDACTED] Bin Ladin received less than market value for firms and properties liquidated in Sudan and had to make initial outlays of \$50-\$100 million upon his relocation to Afghanistan. Bin Ladin also may have seen a drop-off in funding from wealthy Gulf patrons in the wake of his increased publicity as a terrorist. If the liquidation of these businesses and possible reduction in Gulf support cut off a significant revenue stream that was not replaced, Bin Ladin's wealth may have been reduced by several tens of millions of dollars or more.
- [REDACTED] few of Bin Ladin's businesses in Sudan generated a profit, so their liquidation was of little consequence. He also has been able to rely on major sources of funding during his 15-year career as a mujahaddin, especially from wealthy Gulf families; and he may continue to have access to his family's wealth. Upon relocating to Afghanistan, moreover, Bin Ladin reportedly began his involvement in the lucrative drug trade, while his apparently significant financial support for the Taliban merely replaced the funding he had been providing to Sudan's National Islamic Front (NIF). If Bin Ladin has been able to make up for declining revenue streams without significantly increasing expenditures, he would have been able to maintain or even increase his stock of assets over the years. [REDACTED]

An alternative but, in our view, unlikely hypothesis is that Bin Ladin's assets have been drawn down much further, or that substantial funds are immobilized. [REDACTED]

[REDACTED] a foreign exchange dealer who regularly handles Bin Ladin's funds was unable to deliver a large portion of cash that Bin Ladin had requested. Bin Ladin reportedly attributed the cash squeeze to the freezing of his accounts in Dubai and Sharjah, UAE and the inability of several unspecified companies in Dubai to operate because of reported government action.

5

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To judge from the sums of money he spent in Afghanistan, however, it does not appear that Bin Ladin is experiencing financial problems. He may be prioritizing expenditures in some instances and focusing his efforts on keeping the Taliban content so that he can continue to reside there without any complications. Bin Ladin understands that international pressure is being placed on the Taliban to turn him over, and realizes that the best way to remain in their good graces is to continue to provide them with financial assistance. We will need additional reporting on funding shortfalls to better ascertain whether these apparent financial shortages are of a short-term nature or whether there truly are cracks in Al-Qa'ida's financial network.

[REDACTED]

The Composition and Location of Bin Ladin's Wealth

Bin Ladin's wealth probably is comprised of liquid funds—cash and bank accounts--and illiquid investments in businesses and real estate. [REDACTED]

Cash.

[REDACTED] albeit unquantifiable, amounts of currency. [REDACTED] Al-Qa'ida members have transacted primarily in Pakistani rupees and US dollars inside Afghanistan. Indeed, the Al-Qa'ida probably depends on cash to a greater extent in Afghanistan which has a less well developed commercial and financial infrastructure than Sudan. In addition, Al-Qa'ida's concentration at various locations outside of metropolitan areas, combined probably with Bin Ladin's increasing uneasiness with the Taliban, probably necessitates that the organization's assets within the country be in a highly liquid form. (S NF)

Bank Accounts. Bin Ladin and Al-Qa'ida members control numerous bank accounts worldwide. [REDACTED] the choice of financial institutions has been based on personal contact within the bank, security concerns, and the bank's adherence to Islamic law. For example, Bin Ladin's companies and Al-Qa'ida members made extensive use of the Islamic banks in Sudan and probably still maintain some accounts there, [REDACTED] NIF cadre—who probably remain sympathetic to Bin Ladin's cause--dominate bank boards and the top management positions. [REDACTED] Bin Ladin, financial officer Madani Al-Tayyib, and other Al-Qa'ida members held numerous accounts at Dubai Islamic Bank because of Bin Ladin's reported personal friendship with DIB Chairman, Saeed Ahmed Lootah. Islamic financial institutions probably are key repositories for Al-Qa'ida's liquid funds because they conform to the principals of Islamic law, which forbids the payment of interest; they therefore operate in line with Bin Ladin's aim of establishing Islamic regimes throughout the Middle East [REDACTED] Because

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Islamic banks are limited in number and have little presence in many developed countries, a fatwa (religious opinion) was issued in Sudan that allowed Bin Ladin to keep funds with non-Islamic institutions, [REDACTED]

- Recently arrested Bin Ladin lieutenant Mamduh Mahmud Salim, a.k.a. Abu Hajer, held an account at Deutsche Bank in Germany, according to press reports. [REDACTED]

[REDACTED]

If Bin Ladin actually has a net worth of \$300 million, it is possible that large accounts might be managed on his behalf by brokers who are sympathetic to Bin Ladin or unaware that they are dealing with Al-Qa'ida members. Such accounts could yield sizable investment returns, which could be used to fund his organization. [REDACTED]

Businesses. Al-Hijra Construction Company and Khartoum Tannery may be the only Bin Ladin-owned businesses currently in operation in Sudan; [REDACTED]

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Outside of Sudan, Bin Ladin owns several [REDACTED] businesses in Dubai and an [REDACTED] company in Qatar, [REDACTED] Al-Qa'ida also has investments in the seafood industry in Yemen, where some of Bin Ladin's members settled after leaving Sudan, and in Somalia, [REDACTED] Bin Ladin also may own stakes in Malaysian companies:

[REDACTED]

Real Estate and Property. Shortly after he left Sudan, Bin Ladin was in the process of selling his farms and properties, [REDACTED] Bin Ladin also has moved most of his associates in Sudan with him to Afghanistan--thus relinquishing his control of training camps in Sudan. [REDACTED] Bin Ladin established some 15 training camps in Afghanistan and several farms that are used as cover for Al-Qa'ida activities. [REDACTED]

Moving the Money

Usama Bin Ladin uses numerous mechanisms to transfer funds. [REDACTED]

Couriers. Bin Ladin makes extensive use of couriers to transfer and receive funds--probably cash, in large part. The secretive and virtually untraceable nature of cash payments makes it possible to finance operations with little threat [REDACTED]

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[REDACTED]

Non-Government Organizations. [REDACTED]

[REDACTED] Bin Ladin and his associates make extensive use of non-governmental charitable organizations (NGOs) to transfer funds. Bin Ladin-affiliated Islamic NGOs--such as Maktab al-Khidamat (MK), which Bin Ladin may have co-founded; the International Islamic Relief Organization (IIRO); Al-Haramayn; the Islamic Relief Agency (ISRA); Lajnat al Dawa al Islamiya; Mercy International; and others--are convenient money couriers because they maintain offices in Afghanistan, Albania, Pakistan, and other locations where Bin Ladin associates are prevalent. Despite their sponsorship by Gulf governments, Bin Ladin associates have been able to penetrate some offices of these organizations:

[REDACTED]

Underground Bankers. Bin Ladin probably transfers and receives much of his day-to-day financial support via the underground--or Hawala--banking system. Those who provide Hawala services also may operate legitimate money exchange offices as a front for illegal activities; cash transactions via this mechanism are extremely difficult to trace.

[REDACTED]

Businessmen Bin Ladin apparently has used the services of businessmen to launder funds and conceal some of his transactions. [REDACTED]

[REDACTED]

9

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[REDACTED]

Conventional Banks. Undoubtedly, banks continue to be used by Bin Ladin and his associates to facilitate fund movements. In some cases, they use contacts inside the institutions to facilitate transactions—especially in the case of Islamic banks. [REDACTED] DIB Chairman Saeed Ahmed Lootah authorizes--stamps and signs--some of Bin Ladin's letters of credit. In addition, Bin Ladin may have sympathetic bank personnel willing to conduct transactions at Al-Shamal Islamic Bank, the Animal Resources Bank, and the Farmers' Bank for Investment and Rural Development, all of which are in Sudan and allegedly were capitalized partly by Bin Ladin. [REDACTED]

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10Top Secret
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Commercial Mail Services. Bin Ladin and his associates appear to use both public and private mail services.

11

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[REDACTED]**Current Sources of Funds**

[REDACTED] Usama Bin Ladin receives funding, donations, and revenues from various sources, although we are not able to estimate with confidence the dollar value of these flows.

- If Bin Ladin actually controls a liquid financial empire worth \$300 million--and it is largely invested in financial institutions--the most important and reliable source of income probably is the return on investment. Although Islamic banks are forbidden to pay interest to depositors, some types of accounts held at these banks yield "profits" that conservatively could reach 10 percent--or \$30 million a year to Bin Ladin.

The most important sources of outside financial support probably are wealthy family members, several of whom maintain contact with Usama or have similar militant views; wealthy Gulf sponsors; and Islamic NGOs. Bin Ladin also may be developing ties to and profiting from the drug trade. Less important sources of revenue for Al-Qa'ida appear to be from Bin Ladin-owned businesses and state sponsors. [REDACTED]

Family members. Despite the Bin Ladin family's public disavowal of Usama Bin Ladin and his activities, strong family ties that characterize Arab culture may make it difficult for Bin Ladin's family members to personally turn away Usama. Family friends acknowledge Usama Bin Ladin's continued contact with family patriarch, Bakr Bin Ladin; his sisters; and with his mother, Alva al-Attas, whose most recent visit to Usama was in May 1998 [REDACTED]

Such contact suggests that Bin Ladin m [REDACTED]

In addition, the Bin Ladin family business in Saudi Arabia was built on its close ties to the Saudi ruling family, which has given the Bin Ladin companies a virtual monopoly over construction contracts; it therefore is possible that the family's attempt to distance itself from Usama is at least partly based on economic reasons rather than turning away from Usama. [REDACTED]

Half-brother Qasim Bin Ladin is directly involved in the Al-Qa'ida organization, [REDACTED]

[REDACTED] the Saudi Government
he Kingdom in 1996 and ordered the
blocking of all profits of Bin Ladin Group from reaching Usama, [REDACTED]

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[REDACTED]
[REDACTED] Although most of the funds
s have had varying degrees
of success in petitioning Saudi courts to gain access to portions of Usama's
assets.

Usama Bin Ladin may profit from family business connections outside of Saudi Arabia:

- Press reporting from late 1996 indicates that Usama Bin Ladin may be a partner with his brother Yeslam in the Geneva-based Saudi Investment Company SA (SICO), which has offices in the Cayman Islands and Curacao. The report alleged that Usama Bin Ladin used SICO to expand his financial empire during the 1980s.

Gulf Sponsors. Bin Ladin probably maintains support from Gulf sympathizers, including some prominent merchants and government officials who reportedly contributed millions of dollars to his efforts during the Afghan war,

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- Bin Ladin and s associates probably receive logistical support--and possibly funding--from dical Yemen Al-Islah Party leader Abd Al-Majid Zindani, who has operat d training camps for Isalmic extremists. [REDACTED] Zindani has been in direct contact with Usama Bin Ladin. [REDACTED]

Non-Governmental Organizations. Bin Ladin and Al-Qa'ida probably receive Gulf funding diverted from offices of Islamic NGOs, particularly the MK, IIRO, Al Haramayn, Muwafaq Foundation, ISRA; Mercy International, Lajnat al-Dawa al-Islamiya, and others. The lack of strict auditing procedures at distant branch offices make NGOs diversions of funds to Bin Ladin a distinct possibility.

Drug Trafficking. Since mid-1997, Bin Ladin--with the assistance of the Taliban, several NGOs, [REDACTED]--has turned to drug trafficking to generate revenues, [REDACTED] Profits to Bin Ladin may be quite lucrative; [REDACTED]

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- In early 1997 [REDACTED] Bin Ladin was advocating to almost everyone he met that heroin trafficking was an effective weapon against the West—particularly, the United States. [REDACTED]

Commercial Concerns. [REDACTED]

[REDACTED] are winding down or that it is experiencing financial problems. Although some companies managed by the Al-Qa'ida organization worldwide are expected to fund local cells, they most likely are used as cover sponsors for Bin Ladin's activities. [REDACTED]

State Sponsors. Bin Ladin probably would eschew regular financial support from state sponsors out of concern a government may try to control Al-Qa'ida. A few reports suggest, however, that he may have received financial support from Sudan and Iran:

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Tehran's financial support to Bin Ladin would be at significantly lower levels. [REDACTED]

Expenditures

Intelligence reporting suggests Bin Ladin has incurred considerable costs in moving to Afghanistan and paid out large sums to the Taliban. Nevertheless, reporting is not available on how his current expenditures compare to his spending patterns while in Sudan. As is the case with other extremist organizations that use terrorism as a foreign policy tool, the amount of funding Bin Ladin earmarks for specific terrorist purposes probably amounts to a small percentage of Al-Qa'ida's overall budget.

[REDACTED] Bin Ladin provided [REDACTED] to the family members of those who participated in bombing the US Embassies in Nairobi and Dar Es Salaam. [REDACTED]

Infrastructure. Bin Ladin probably suffered initial financial losses when he moved to Afghanistan. [REDACTED] he was forced to sell his assets in Sudan at a loss in addition to rebuilding the housing and training facilities for his Al-Qa'ida organization. In addition, Bin Ladin was forced to relocate to a country where the infrastructure was poor, the housing supply insufficient, and the training facilities inadequate.

[REDACTED]

While the reporting implies that considerable financial outlays had to be made, the fact that Bin Ladin was able to establish a foothold in his new environment over a relatively short period of time suggests that he had a ready availability of funds.

[REDACTED] he currently maintains around 15 training camps, each of which probably accommodate 50 mujahaddin, at most, although there are no good estimates of the number of men training at each camp. Nevertheless, Bin Ladin

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provides food and shelter for the trainees and their families. [REDACTED]

[REDACTED] Bin Ladin was providing the volunteers in his camps in Sudan with approximately \$160 per month. [REDACTED]

- Press reports from October 1998 indicate that Bin Ladin has begun to build a new military installation in Qandahar to replace the camps destroyed in the August raids. *The British Sunday Telegraph* reported that Bin Ladin had completed the construction of another complex in the city which is currently being used to house some of his troops. [REDACTED]

Bin Ladin probably incurs some expense on his support infrastructure outside of Afghanistan. Al-Qa'ida operates cells throughout the Middle East and Africa; in several countries in Europe; and in the United States. Although leaders of these cells probably are paid by Bin Ladin, their operations might also be funded by donations from NGOs, local sympathizers, or businesses.

- According to press reports from October 1998, Al-Qa'ida members responsible for the bombings of the US Embassies in Nairobi and Dar Es Salaam had operated a fish business in the coastal town of Mombassa during the past four years. [REDACTED]

The Taliban. Bin Ladin probably is one of the key sources of financial support for the Taliban, along with the Pakistani Government and the drug trade. He may have provided up to \$100 million to the Taliban since he arrived in Afghanistan in early 1996, [REDACTED]

- [REDACTED] Bin Ladin provided the Taliban with approximately \$28 million in 1998 for military purposes.

- [REDACTED] Bin Ladin donated [REDACTED] to the Taliban in [REDACTED] 1997 [REDACTED] Such funding on an annual basis would [REDACTED]

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Although it is difficult to accurately determine whether Bin Ladin is spending more money in Afghanistan than he did in Sudan, reporting indicates that he provides for basic foodstuffs, shelter, military equipment, and training facilities to the Taliban. In addition, Bin Ladin may be more beholden to the Taliban than he was to the NIF, because there are fewer countries willing to accommodate Bin Ladin and his organization. The Taliban may have used this against Bin Ladin to extract additional income:

- [REDACTED] the Taliban increasingly is turning to Bin Ladin for financial support. In June 1998, for example, it requested that Bin Ladin provide funds to purchase arms and ammunition from the international gray arms market, and to help pay the salaries of Taliban military forces. [REDACTED]

- Since [REDACTED] 1999, Bin Ladin has had a contract with all of the bakeries in Qandahar to provide 300,000 loaves of fresh bread for Taliban troops on the northern front. [REDACTED] the cost to Bin Ladin is some \$29,700 a day (\$11 million per year).

- In mid-1997, [REDACTED] Bin Ladin purchased sixty-five vehicles for the Taliban for approximately \$900,000. These purchases followed another series of vehicle purchases Bin Ladin made for senior Taliban officials following his arrival in Qandahar [REDACTED]

Bin Ladin also has been involved in numerous commercial projects for the Taliban since his arrival in Afghanistan:

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18

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- Press reports from October 1998 indicate that Bin Ladin is financing the construction of a commercial center in the main marketplace in Qandahar and a mosque on the site of an old movie theater.
- [REDACTED] Bin Ladin was involved in several construction projects in Qandahar and had contracted with fifty local brick producers to provide him with seventy-five percent of their combined total monthly output. Bin Ladin reportedly was involved in building four large housing projects, 11 mosques, and some 20 new religious schools. [REDACTED] Bin Ladin pledged to help reconstruct roads and provide financial support for training camps. [REDACTED]

Financing Other Terrorist Groups. Bin Ladin funds other militant Islamists and terrorist organizations that share his views:

- Bin Ladin reportedly funds a Pakistani national, Abdul Nasser, who has helped to transfer Arab terrorists from Pakistan to Afghanistan [REDACTED] Abdul Nasser allegedly supplies the terrorists with explosives.
 - Bin Ladin finances Al-Ittihad Al-Islami, an insurgent and terrorist organization in Somalia. [REDACTED]
- [REDACTED]
- [REDACTED]

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[REDACTED]

Financial Support to Islamic NGOs. While Bin Ladin receives NGO financial support diverted from Gulf sponsors, [REDACTED] Bin Ladin also provides funding to specific offices of these organizations, [REDACTED]

[REDACTED] Bin Ladin was a co-founder of the MK with Palestinian 'Abdallah Azzam in the early 1980s. 'Azzam reportedly convinced Bin Ladin that he should use his significant financial resources for the Afghan cause. [REDACTED]

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[REDACTED]Appendix**Islamic Banks Possibly Harboring Bin Ladin's Wealth** [REDACTED]

Despite possibly some concentration in the Middle East, Bin Ladin's assets are dispersed worldwide, and they probably have become even more widely scattered since his move to Afghanistan in May 1996. Islamic financial institutions, nevertheless, may be key repositories for Al-Qa'ida's liquid funds. Of some 180 Islamic banks operating worldwide, [REDACTED] a handful may house Bin Ladin-linked accounts:

- *Dubai Islamic Bank (DIB)* has served as a key financial conduit for Al-Qa'ida and for Bin Ladin's companies in Sudan, [REDACTED] Bin Ladin and his companies maintained [REDACTED] accounts at DIB [REDACTED] DIB Chairman Saeed Ahmed Lootah is a close friend of Bin Ladin's.
- Islamic banks in Sudan—especially *Al Shamal Islamic Bank*, *Al Baraka Bank (Sudan)*, *Tadamon Islamic Bank*, and *Faisal Islamic Bank of Sudan (FIBS)*—were used by Bin Ladin's companies and Al Qa'ida members, especially before Bin Ladin departed Sudan, [REDACTED]
[REDACTED] Bin Ladin maintained an account in his own name at Al Baraka Bank (Sudan) and that Al Shamal General Manager Hasan Satti implemented security procedures for Bin Ladin's accounts in 1994. In addition, directors of FIBS include Haydar Mohammad Bin Ladin, half-brother of Usama; Mohamed Salih Bahareth, an executive of the Saudi Bin Ladin Group; and Bashir Hasan Bashir Osman, who probably is identical to the former owner of the now-defunct al-Shifa Pharmaceutical Plant. Moreover, press reports indicate that Bin Ladin provided capital for Al Shamal and possibly other banks in Sudan. Although Bin Ladin reportedly has markedly cut his investments in Sudan, his active companies in Sudan probably maintain accounts at some of these banks.

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[REDACTED]

[REDACTED]

[REDACTED] "Sheikh Rajhi,"
[REDACTED] deposited [REDACTED] into a
[REDACTED] bank account controlled by Maktab al-Khidamat, an Islamic charity
closely associated with Usama Bin Ladin since the early 1980s.

[REDACTED]

[REDACTED], Zindani--an Islamic radical--is a contact of Usama Bin Ladin and
that this Islamic bank is a key source of funding for Zindani's political
ambitions.

[REDACTED]

[REDACTED]

22

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